



ROY ROMER  
Governor

PATRICIA A. NOLAN, MD, MPH  
Executive Director

Hazardous Materials and Waste Management Division  
4210 East 11th Avenue  
Denver, Colorado 80220-3716  
(303) 331-4830 / FAX (303) 331-4401

Telefax Numbers:  
Main Building, Denver  
(303) 322-9076

Piarmigan Place, Denver  
(303) 320-1529

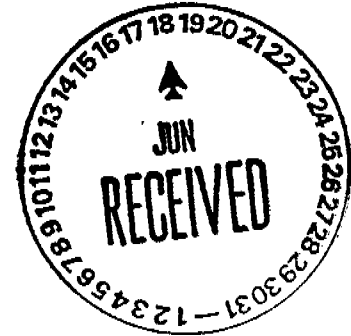
First National Bank Building, Denver  
(303) 355-6559

Grand Junction Office  
(303) 248-7198

Pueblo Office  
(719) 543-8441

June 12, 1992

Mr. Martin Hestmark  
U.S. Environmental Protection Agency  
Region VIII  
999 18th Street, Suite 500, 8WM-C  
Denver, Colorado 80202-2405



RE: Chemical-Specific Benchmarks Tables

Dear Mr. Hestmark,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), has reviewed the above referenced tables and associated correspondence submitted by DOE and prime operating contractor, EG&G. The Division recommends that these tables be conditionally approved pending incorporation of the attached comments.

Once the attached comments have been incorporated and the corrected tables reviewed, the Division would like for these tables, and appropriate text, to replace the existing "proposed chemical-specific ARAR/TBC" tables in all approved RFI/RI workplans, all workplans under review, and all future workplans. Potential chemical-specific ARARs are included in RFI/RI Workplans only to support sample analysis levels. With appropriate explanatory text, the benchmark tables can adequately fulfill this role while further site-wide ARAR discussions occur.

We urge DOE and EG&G to review the current RFI/RI analytical procedures and methods for their ability to generate data that meets or exceeds the lowest benchmark standards for all analytes. Without this level of data, the RFI/RI Reports may not be adequate to support subsequent feasibility studies and remedial decisions, let alone baseline risk assessments.

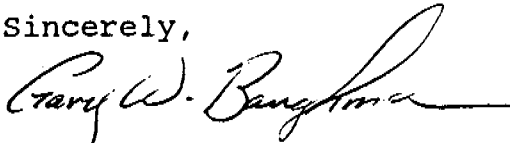
It should be noted that the Division's recommendation for approval for the benchmarks will be limited to ground and surface water standards. It should be emphasized to DOE that it is up to them to develop, and submit for agency review, similar benchmarks for soil and air as soon as possible.

ADMIN RECORD

A-SW-000417

If you have any questions regarding these matters, please call me at 331-4847 or Joe Schieffelin of my staff at 331-4421.

Sincerely,

A handwritten signature in cursive script, reading "Gary W. Baughman". The signature is written in dark ink and is positioned above the typed name.

Gary W. Baughman  
Unit Leader, Hazardous Waste Facilities  
Hazardous Materials and Waste Management Division

cc: Charlotte Robinson, AGO  
Jeb Love, RFP  
Judy Bruch, RFP  
Barbara Barry, RFP  
Martin Hestmark, EPA  
Rich Schassburger, DOE  
Farrel Hobbs, EG&G  
Linda Rock, EG&G